CASE: UE 416 WITNESSES: MELISSA NOTTINGHAM AND SCOTT SHEARER

# PUBLIC UTILITY COMMISSION OF OREGON

**STAFF EXHIBIT 2403** 

**Data Requests and Responses** 

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 140 Dated March 9, 2023

#### Request:

For each of the service fees listed below, please provide the cost analysis for how PGE calculated the proposed new rate(s). Please include the origin of the 4% increase for labor rates applied to increases, payroll loading, tool loading, transportation loading, and how the amount of labor needed to perform each service was determined:

- a. Special Meter Reading Charge (non-network) Rule H.4E
- b. Meter Test Charge Rule M.1C
- c. Field Visit Charge Rule H.2
- d. Monthly Service Charge Schedule 201 and 202
- e. Disconnection/Reconnection Rule H

#### Response:

For each of the services listed above the cost analysis is provided in the workpapers contained in Exhibit 1300.

Confidential Attachment 140-A provides the origin for the 4% increase in labor rates The increase in labor rates comes from the August 2022 Global Insights Report, in tab P&W1A, "Wages & Salaries."

Attachment 140-B provides the loading percentages for all the service fees listed above except the Monthly Service Charge. The loading percentages are from PGE's 2022 Accounting Practices and Procedures Bulletin effective September 9, 2022.

Confidential Attachment 140-C provides the non-union loading percentages for the Monthly Service Charge The non-union loading percentages are provided by PGE's corporate accounting department.

The amount of labor needed to perform each service is the estimated average time it takes to perform each service.

Attachments 140-A and 140-C are protected information and subject to Protective Order No. 23-019

#### **2022 RATES FOR BILLING JOBS**

APPB: 2022-01

August 30, 2022

This APPB establishes the current rates for billing jobs. For instructions and procedures for the billing of goods and services, refer to APPD 5-201-1 (General Instructions for Billing Jobs). These rates should be used in accordance with guidelines established in the abovementioned APPD. The effective date of the rate change is September 9, 2022.

Exhibit 1
Loading and Transportation Rates

Regional Line Crew Labor Rates (Maximo)

							Pren	nium Pay
	Strai	ght Time	O	vertime	Hi	gh Time	("Gold	len Time")
	Ra	ate [1]		Rate	R	ate [2]	Ad	lder [3]
Average crew member hourly rate	\$	55.51	\$	111.02	\$	111.02	\$	55.51
DOSE overhead [4]		99.36		99.36		99.36		-
Payroll loading		39.41		18.87		48.85		9.44
Tool loading		8.88		8.88		8.88		-
Transportation loading [5]		22.20		22.20		22.20		-
Regional Line Crew hourly rates to								
be used [6]	\$	225.36	\$	260.33	\$	290.31	\$	64.95

**Substation Operations and Other Distribution Departments** 

	Straight Time	Overtime
	Rate	Rate
Labor	Actual Labor	Actual Labor
DOSE overhead	179%	90%
Payroll loading	71%	17%
Tool loading	16%	8%
Transportation loading [5]	40%	20%

17%

Stores loading (all departments) [7]

Automobile mileage rate (all departments) [5] \$0.585 per mile

### 2022 RATES FOR BILLING JOBS APPB: 2022-01 August 30, 2022

- [1] Average crew member hourly rate, updated annually per union agreement, is determined by a calculation of crew members (March 1, 2022 February 29, 2024). Rates were updated as of February 21, 2022.
- [2] "High Time" Per Article 18.1.16 of the agreement, work performed at a height of eighty (80) feet or more shall be paid at the Overtime Rate for a minimum of one hour. Per Article 20.2 of the agreement, Overtime Rate is two (2) times regular rate of pay.

The payroll loading rate is calculated using a blended straight time/overtime loading rate.

(3) "Premium Pay" adder to be charged to customer when billing job from previous day causes line crew members to be paid premium pay on the following day.

A combined payroll tax and injuries-and-damages loading of 17% is applied to the straight-time average crew member hourly rate.

"Premium Pay" – Per Article 20.6 of the agreement, work shall be paid at the overtime rate for the regular shift when an employee has not had 8 ½ hours relief from previous overtime work and must include 6 hours OT outside the employee's regular schedule.

- [4] DOSE overhead covers the cost of engineering and support functions for line crews. The rate is determined by calculating the average of two years actuals of the amount of DOSE balance divided by the amount of line crew labor.
- [5] Transportation loading covers the cost of all vehicles other than automobiles, regardless of type. The rate is determined by calculating the five-year average of the amount of transportation charges charged to crew work divided by the actual amount of line crew labor. Automobiles are charged at the IRS Standard Mileage Rate for the current year.
- [6] These are the rates to be used for both estimates and actual billings when detailed labor breakdown is not required or available.
- [7] Stores Issues Obtain the pricing for materials from the PeopleSoft Materials Management System. Multiply the total price of materials by the stores loading rate.

NOTE: For the sale of surplus items or storeroom materials not related to a billing job, use the Purchasing & Material Form MDSR (Material Disposal and Sales Request) in the Storeroom Procedures Manual (SPD 700-1).

Corporate Planning has an Excel template to assist with billings. If additional charges or fees are to be applied these should be discussed with your Corporate Planning Analyst prior to finalizing the billing document.

#### **2022 RATES FOR BILLING JOBS**

**APPB: 2022-01** August 30, 2022

## Exhibit 2 ELECTRIC & SERVICES FOR STONE CREEK AND PORT OF SAINT HELENS EFFECTIVE 9/9/2022

	Stone Creek [2]	Port of St Helens [3]
Payroll Loading:		
Straight time	76%	76%
Overtime	17%	17%
Tool loading [1] Stores Loading	16% 17%	16% 17%
Vehicle - Light-duty trucks Under 14,000 GVW [1]	\$12.80/hr	\$12.80/hr

- [1] Tools and vehicle rates are applied to generation crews only. All other vehicle expenses are charged directly to the applicable operating unit.
- [2] Stone Creek loading rates are billed under the Operating and Maintenance Agreement between PGE and Eugene Water & Electric Board effective April 1, 2010 (PGE Audit # 40426-00), Amendment No. 1 effective July 1, 2020.
- [3] Port of St. Helens loading rates are billed under the Project Operations Agreement between PGE and Port of St. Helens effective August 30, 2006 (PGE audit # 50152-00).

2022 RATES FOR BILLING JOBS	APPB: 2022-01
	August 30, 2022

## Exhibit 3 ELECTRIC & SERVICES FOR PELTON REG-DAM EFFECTIVE 9/9/2022

	TELION REG-DAM ENTECTIVE 3/3/2022	
I. Non-Distribution labor	oading rates (includes hydro plant departments, engineering, environme	ntal services):
Straight time	76%	
Overtime	17%	
II. Distribution labor loa	ing rates (transmission and distribution departments):	
Straight time	76%	
Overtime	17%	

Stores Loading 17%

Tools Vehicles 16%

Vehicle expenses incurred by non-distribution departments are charged directly to the Pelton Reg-Dam operating unit.

\$12.80/hr (Light-duty trucks udner 14,000 GVW)

Labor, tools, vehicles and store loadings are determined annually and are effective January 1. Union labor rates change based on the Union labor agreement, typically March 1 but can also occur more or less frequently. Changes in union labor rates require a corresponding update to loadings.

Pelton Reg-Dam loading rates are billed under the Operating and Maintenance Agreement between PGE and Warm Springs Power Enterprises Agreement effective November 2000 (PGE Audit # 45646-00) and the Change Order Agreement between PGE and Warm Springs Power Enterprises Agreement effective June 1, 2004 (PGE Audit # 45646-01).

Approved by:	Jeff Stevens	8/30/2022
	Jeff Stevens	Date
	Manager, Corporate Accounting	

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 141 Dated March 9, 2023

#### Request:

For each of the service fees listed below, please provide details on often each fee was charged for calendar years 2019 through 2022, please note any anomalies in the data, such as the effect the Covid-19 moratoriums had on these fees, if applicable:

- a. Special Meter Reading Charge (non-network) Rule H.4E
- b. Meter Test Charge Rule M.1C
- c. Field Visit Charge Rule H.2
- d. Monthly Service Charge Schedule 201 and 202
- e. Disconnection/Reconnection Rule H

#### Response:

Service Fees	2019	2020	2021	2022
Special Meter Reading 966 Charge (non-network)		1,451	1,616	1,956
Meter Test Charge <sup>1</sup>	0	0	0	0
Field Visit Charge <sup>2</sup>	9,795	2,263	965	64
Monthly Service Charge  – Schedule 201 and 202 <sup>3</sup>	241	402	628	638
Reconnections <sup>4</sup>	25,263	4,250	156	4,689

<sup>&</sup>lt;sup>1</sup> Rule M.1C: "Charge is only imposed if a Customer or ESS requests such a meter test more than once in a 12-month period."

<sup>&</sup>lt;sup>2</sup> PGE's Second Supplemental Filing of Advice No. 22-21 added language for low-income exclusions to Rule H in accordance with the Division 21 rulemaking, effective September 30, 2022. Rule H.2: "The first Field Visit Charge within a rolling 12-month period will be waived for Residential Customers who qualify as an eligible Low-Income Residential Customer as that term is defined in OAR 860-021-0008."

<sup>&</sup>lt;sup>3</sup> Existing QFs under PGE's proposal would not be charged under the proposed rate in Schedule 300.

<sup>&</sup>lt;sup>4</sup> PGE's Second Supplemental Filing of Advice No. 22-21 added language for low-income exclusions to Rule H in accordance with the Division 21 rulemaking, effective September 30, 2022. Rule H.3A: "The reconnection charge for the first two remote reconnections or first nonremote reconnection in a calendar year will be waived for Residential Customers who qualify as an eligible Low-Income Residential Customer as that term is defined in OAR 860-021-0008."

The Covid19 moratorium reduced the number of Field Visit Charges and Reconnection Fees. See the Stipulated Agreements in Commission Order No. 20-401 related to the Field Visit Charge and Disconnections/Reconnections and updates made in Commission Order Nos. 21-057, 21-164, 21-236 and 21-483.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 142
Dated March 9, 2023

#### Request:

Please explain the reasoning for the site visit fee and the reconnection fee to be the same. What incentive does the customer have to pay to avoid disconnection?

#### Response:

- 1. The Field Visit Charge and Standard Reconnection Fee at Meter Base are the same rate because these tasks are both performed by a Field Connect Representative and are estimated to take the same amount of time regardless of the task. To avoid treating customers within the same rate class differently based on their meter's ability to remotely reconnect, the same standard reconnection fee is applied.
- 2. Access to electricity and possible future reconnection fees are incentives for customers to avoid disconnection.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 143
Dated March 9, 2023

#### Request:

For the Monthly Service Charges listed in Schedule 201 and 202, please provide:

- a. Will each Qualifying Facilities contract be updated to reflect the new fee and;
- b. If not, what is the justification for grandfathering prior contracts

#### Response:

- A. Prior Qualifying Facilities (QF) contracted with PGE will not be updated to reflect the new fee.
- B. PGE cannot update the Monthly Service Charge for QFs with executed Power Purchase Agreements (PPA) because the PPA includes the vintage of Schedule 201 effective at the time the PPA was signed. PGE's Schedule 201, which is incorporated into the PPA, establishes a \$10 monthly service charge. As part of the PPA contract, PGE is unable to update or change the monthly service charge.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 144 Dated March 9, 2023

#### Request:

Please provide the following data, broken down by zip code, for each customer class (i.e. residential, commercial, etc.):

- a. Count of Smart Meters that support remote disconnect/reconnect functionality;
- b. Count of Smart meters that do not support remote disconnection/reconnect functionality; and
- c. Count of Non-network meters that require a site visit to read, disconnect, and reconnect service.
- d. For each of the items listed in a-c above, please provide a monthly breakdown, by zip code, for all non-payment disconnections, dated to the end of the Covid-19 moratorium.

#### Response:

Attachment 140-A provides the response to parts a, b and c.

In response to part d, PGE did not perform any disconnections for non-payment during the Covid-19 moratorium.

**UE 416** 

#### PGE's Response to OPUC DR 144

ZIP CODE	<b>CUSTOMER CLASS</b>	PGE' REMOTE CONNECT AMI METER
97002		329
	Commercial/Industrial	35
	Residential	292
	State	2
. X	Summary Billing	
97003		5,499
	Commercial/Industrial	35
	Residential	5,464
38	State	
	Summary Billing	
97004		142
	Commercial/Industrial	37
3	Residential	105
	Summary Billing	-
97005	, , ,	7,700
	Commercial/Industrial	64
	Residential	7,636
S.	State	.,,
2,	Summary Billing	
97006		10,544
	Commercial/Industrial	25
	Residential	10,519
	State	10,010
-	Summary Billing	1
97007	,	6,578
37007	Commercial/Industrial	22
	Residential	6,556
	Summary Billing	5,555
97008	January 2 ming	5,707
37000	Commercial/Industrial	3,707
	Residential	5,704
S	State	3,764
	Summary Billing	
97009	January Dinning	430
57005	Commercial/Industrial	49
	Residential	380
	State	1
	Summary Billing	+
97011		91
3/011	Commercial/Industrial	2
12.	Residential	89
97013	nesidential	
2/012	Commercial/Industrial	228 39
	Commercial/industrial	39

UE 416

#### PGE's Response to OPUC DR 144

	Residential	189
	State	
	Summary Billing	
97015		3,606
	Commercial/Industrial	20
	Residential	3,585
	State	
	Summary Billing	1
97017		109
	Commercial/Industrial	17
	Residential	91
	Summary Billing	1
97019		181
	Commercial/Industrial	12
	Residential	169
	State	
	Summary Billing	
97020		78
	Commercial/Industrial	1
	Residential	77
97022		248
	Commercial/Industrial	28
	Residential	220
	Summary Billing	
97023		1,253
	Commercial/Industrial	65
	Residential	1,188
	State	•
	Summary Billing	
97024		2,399
	Commercial/Industrial	29
	Residential	2,370
	State	
	Summary Billing	
97026		317
	Commercial/Industrial	5
	Residential	312
	State	
	Summary Billing	
97027		1,538
	Commercial/Industrial	13
	Residential	1,525
	State	·
	Summary Billing	

#### UE 416

#### PGE's Response to OPUC DR 144

97028		193
	Commercial/Industrial	5
	Residential	188
	State	
97030		7,497
	Commercial/Industrial	30
	Residential	7,465
	State	
	Summary Billing	2
97032		394
	Commercial/Industrial	14
	Residential	380
	State	
	Summary Billing	
97034		2,083
	Commercial/Industrial	38
	Residential	2,045
	State	·
	Summary Billing	
97035		4,467
	Commercial/Industrial	19
	Residential	4,446
	State	•
	Summary Billing	2
97036		
	Commercial/Industrial	
	Residential	
97038		1,439
	Commercial/Industrial	66
	Residential	1,373
	State	
	Summary Billing	
97041	, ,	
07012	Commercial/Industrial	
	State	
97042		141
01012	Commercial/Industrial	21
	Residential	119
	State	113
	Summary Billing	
97045	,	5,494
3,343	Commercial/Industrial	149
	Residential	5,345
	State	3,343
	Juice	

#### UE 416 PGE's Response to OPUC DR 144

	Summary Billing	
97049		225
	Commercial/Industrial	16
	Residential	208
	State	1
97051		
	Commercial/Industrial	
97055		1,563
	Commercial/Industrial	59
	Residential	1,500
	State	
	Summary Billing	4
97056		2
	Commercial/Industrial	1
	Residential	1
97060		2,411
	Commercial/Industrial	43
	Residential	2,368
	State	
	Summary Billing	
97062		5,398
	Commercial/Industrial	27
	Residential	5,371
	State	
	Summary Billing	
97067		335
	Commercial/Industrial	12
	Residential	323
	State	
	Summary Billing	
97068		2,203
	Commercial/Industrial	39
	Residential	2,164
	State	
	Summary Billing	
97070		5,657
	Commercial/Industrial	26
	Residential	5,630
	State	1
	Summary Billing	
97071		3,245
	Commercial/Industrial	69
	Residential	3,176
	State	·

UE 416
PGE's Response to OPUC DR 144
Attachment A

	Summary Billing	
97078		3,954
	Commercial/Industrial	19
	Residential	3,935
	Summary Billing	
97079		
	Commercial/Industrial	
97080		4,621
	Commercial/Industrial	24
	Residential	4,597
	State	
	Summary Billing	
97086		4,878
	Commercial/Industrial	37
	Residential	4,841
	State	
	Summary Billing	
97089		620
	Commercial/Industrial	44
	Residential	576
	State	
	Summary Billing	
97101		251
	Commercial/Industrial	16
	Residential	235
	State	
97106		337
	Commercial/Industrial	10
	Residential	326
	State	1
97109		17
	Commercial/Industrial	3
	Residential	14
	State	
97111		332
	Commercial/Industrial	26
	Residential	306
	State	
	Summary Billing	
97113		2,106
	Commercial/Industrial	30
	Residential	2,076
	State	
	Summary Billing	

UE 416
PGE's Response to OPUC DR 144

223
Attachment A

97114		223
	Commercial/Industrial	14
	Residential	209
	State	
97115		367
	Commercial/Industrial	24
	Residential	343
	State	
97116		125
	Commercial/Industrial	16
	Residential	109
	State	
97117		59
	Commercial/Industrial	9
	Residential	50
	State	
97119		344
	Commercial/Industrial	24
	Residential	320
	State	
	Summary Billing	
97123	, ,	7,091
	Commercial/Industrial	88
	Residential	7,002
	State	•
	Summary Billing	1
97124		10,728
	Commercial/Industrial	75
	Residential	10,652
	State	•
	Summary Billing	1
97125		1
	Commercial/Industrial	1
	Residential	
97127		454
	Commercial/Industrial	3
	Residential	451
97128	+	80
	Commercial/Industrial	9
	Residential	71
97132		4,273
J, 132	Commercial/Industrial	77
	Residential	4,179
	State	7,113
<u> </u>	State	

UE 416
PGE's Response to OPUC DR 144
17 Attachment A

	Summary Billing	17
97133		508
	Commercial/Industrial	19
	Residential	489
	State	
	Summary Billing	
97137		84
	Commercial/Industrial	9
	Residential	75
	State	
97140		2,528
	Commercial/Industrial	50
	Residential	2,478
	State	,
	Summary Billing	
97148		271
	Commercial/Industrial	20
	Residential	251
	State	
	Summary Billing	
97201	, ,	2,312
	Commercial/Industrial	7
	Residential	2,304
	State	1
	Summary Billing	
97202		8,207
	Commercial/Industrial	74
	Residential	8,132
	State	,
	Summary Billing	1
97203		5,415
	Commercial/Industrial	39
	Residential	5,375
	State	
	Summary Billing	1
97204		174
	Commercial/Industrial	13
	Residential	159
	State	1
	Summary Billing	1
97205		1,120
	Commercial/Industrial	6
	Residential	1,114
	State	·

UE 416
PGE's Response to OPUC DR 144
Attachment A

	7.404
	7,184
Commercial/Industrial	73
Residential	7,111
State	
Summary Billing	
Commercial/Industrial	
	7,918
Commercial/Industrial	27
Residential	7,890
State	-
Summary Billing	1
	2,861
Commercial/Industrial	25
Residential	2,836
State	·
Summary Billing	
	3
Commercial/Industrial	
Residential	3
State	
State	
	914
Commercial/Industrial	8
Residential	906
State	
Summary Billing	
	6,707
Commercial/Industrial	78
Residential	6,625
State	3
Summary Billing	1
	2,131
Commercial/Industrial	36
Residential	2,095
Summary Billing	
	786
Commercial/Industrial	13
Residential	773
State	
Summary Billing	
	4,909
	Residential State Summary Billing  Commercial/Industrial Residential State  State  Commercial/Industrial Residential State  Summary Billing  Commercial/Industrial Residential State Summary Billing  Commercial/Industrial Residential State Summary Billing  Commercial/Industrial Residential State Summary Billing  Commercial/Industrial Residential State Summary Billing  Commercial/Industrial Residential State Summary Billing  Commercial/Industrial Residential Summary Billing

## UE 416 PGE's Response to OPUC DR 144 Attachment A

	Commercial/Industrial	45
	Residential	4,862
	State	4,002
	Summary Billing	2
07210	Juninary Bining	
97218	Commoraial/Industrial	
	Commercial/Industrial	
	Summary Billing	
97219		4,387
	Commercial/Industrial	41
	Residential	4,345
	State	1
	Summary Billing	
97221		1,641
	Commercial/Industrial	9
	Residential	1,632
	State	
	Summary Billing	
97222		6,129
	Commercial/Industrial	42
	Residential	6,086
	State	
	Summary Billing	1
97223		9,368
	Commercial/Industrial	40
	Residential	9,328
	State	
	Summary Billing	
97224		6,446
	Commercial/Industrial	19
	Residential	6,427
	State	-,
	Summary Billing	
97225	, ,	5,086
37223	Commercial/Industrial	28
	Residential	5,057
	State	3,037
	Summary Billing	1
07227	Juninary Bining	115
97227	Commorcial/Industrial	
	Commercial/Industrial Residential	3
		111
	State	
	Summary Billing	1
97229		9,595
	Commercial/Industrial	44

## UE 416 PGE's Response to OPUC DR 144 551 Attachment A

	Residential	9,551
	State	
	Summary Billing	
97230		5,201
	Commercial/Industrial	33
	Residential	5,167
	State	
	Summary Billing	1
97231		263
	Commercial/Industrial	19
	Direct Access Retail Account	
	Residential	243
	State	1
	Summary Billing	
97232		2,546
	Commercial/Industrial	9
	Residential	2,536
	State	· · · · · · · · · · · · · · · · · · ·
	Summary Billing	1
97233	, ,	6,515
	Commercial/Industrial	36
	Residential	6,479
	Summary Billing	-,
97236		4,173
	Commercial/Industrial	41
	Residential	4,132
	State	•
	Summary Billing	
97239		3,766
	Commercial/Industrial	19
	Residential	3,747
	State	·
	Summary Billing	
97240		
	Commercial/Industrial	
97251		
	Commercial/Industrial	
97266	· ·	3,719
	Commercial/Industrial	53
	Residential	3,665
	State	3,003
	Summary Billing	1
97267	, ,	3,200
	Commercial/Industrial	34

## UE 416 PGE's Response to OPUC DR 144 Attachment A

	Residential	3,166
	State	
	Summary Billing	
97280		
	Commercial/Industrial	
97286		
	Commercial/Industrial	
97291		
	Commercial/Industrial	
97294		
	Commercial/Industrial	
97301		10,086
	Commercial/Industrial	103
	Residential	9,980
	State	2
	Summary Billing	1
97302		6,936
	Commercial/Industrial	93
	Residential	6,840
	State	
	Summary Billing	3
97303		3,869
	Commercial/Industrial	32
	Residential	3,837
	State	
	Summary Billing	
97304		221
	Commercial/Industrial	12
	Residential	209
	State	
97305		7,766
	Commercial/Industrial	81
	Residential	7,685
	State	
	Summary Billing	
97306		5,327
	Commercial/Industrial	43
	Residential	5,284
	State	
	Summary Billing	
97310		
	State	
	Summary Billing	
97311		

## UE 416 PGE's Response to OPUC DR 144 Attachment A

	State	
97312		
	Commercial/Industrial	
97317		3,169
	Commercial/Industrial	59
	Residential	3,109
	State	
	Summary Billing	1
97325		25
	Commercial/Industrial	2
	Residential	23
97338		26
37330	Commercial/Industrial	2
	Residential	24
97347	Nesidential	310
9/34/	Commercial/Industrial	9
	Residential	
		301
	State	
97352		19
	Commercial/Industrial	5
	Residential	14
97362		455
	Commercial/Industrial	17
	Residential	438
97371		18
	Commercial/Industrial	1
	Residential	17
97373		
	Commercial/Industrial	
97375		118
	Commercial/Industrial	13
	Residential	105
97378		627
	Commercial/Industrial	28
	Residential	599
	State	
97381		1,818
<b>37301</b>	Commercial/Industrial	50
	Residential	1,768
	State	1,708
97385		24
J/303	Commercial/Industrial	34
	Commercial/Industrial	6
	Residential	28
	State	

### UE 416 PGE's Response to OPUC DR 144

97392		514
	Commercial/Industrial	29
	Residential	481
	State	
	Summary Billing	4
97396		433
97396	Commercial/Industrial	<b>433</b>
97396	Commercial/Industrial Residential	
97396	· · · · · · · · · · · · · · · · · · ·	14

UE 416 PGE's Response to OPUC DR 144 Attachment A

NON-REMOTE CONNECT AMI METER	<b>NON-AMI METER</b>	TOTAL
3,058	1	3,388
1,088		1,123
1,944	1	2,237
25		27
1		1
6,360	1	11,860
735		770
5,616	1	11,081
1		1
8		8
2,108	2	2,252
425		462
1,673	2	1,780
10	9	10
7,042	2	14,744
2,372		2,436
4,589	2	12,227
17		17
64		64
10,084	1	20,629
1,618		1,643
8,437	1	18,957
12		12
17		17
13,161	1	19,740
906	·	928
12,220	1	18,777
35		35
7,376	4	13,087
1,128		1,131
6,204	4	11,912
13		13
31		31
4,174	1	4,605
1,120		1,169
3,025	1	3,406
5		6
24		24
466		557
66		68
400		489
3,189	1	3,418
1,008		1,047

#### UE 416 PGE's Response to OPUC DR 144

2,172	1	2,362
7		7
2		2
7,546	1	11,153
1,917	-	1,937
5,537	1	9,123
39		39
53		54
1,248		1,357
205		222
1,033		1,124
10	*	11
1,317	2	1,500
250		262
1,052	2	1,223
14		14
1		1
374		452
76	, and the second	77
298		375
1,630	1	1,879
399		427
1,229	1	1,450
2		2
4,815	5	6,073
987		1,052
3,781	5	4,974
26		26
21		21
2,788		5,187
494		523
2,281		4,651
4		4
9		9
1,381		1,698
464		469
897		1,209
10		10
10		10
3,868	4	5,410
450		463
3,402	4	4,931
7		7
9		9

UE 416 PGE's Response to OPUC DR 144

758		951
125		130
619		807
14		14
10,143	2	17,642
2,088		2,118
7,966	2	15,433
6		6
83		85
1,954	1	2,349
587		601
1,360	1	1,741
6		6
1		1
7,227	2	9,312
749		787
6,379	2	8,426
1		1
98		98
8,227	4	12,698
1,268		1,287
6,900	4	11,350
11		11
48		50
23		23
21		21
2		2
6,186	1	7,626
1,172		1,238
4,984	1	6,358
4		4
26		26
7		7
5		5
2		2
1,421	1	1,563
310		331
1,099	1	1,219
7		8
5		5
20,355	8	25,857
3,265		3,414
16,961	8	22,314
31		31

UE 416 PGE's Response to OPUC DR 144

98		98
1,580	<del></del>	1,805
146	+	162
1,430	*	1,638
4		5
6		6
6	+	6
	2	1.0
8,012 1,458	2	9,577 1,517
6,515	2	
9	2	8,017 9
30		34
	-	Alica istin
35		<b>37</b> 8
7 28	-	29
		715.40.4
6,827	- 10	9,238
1,059		1,102
5,737		8,105
22		22
9		9
8,036	5	13,439
2,017		2,044
5,999	5	11,375
15		15
5		5
1,441		1,776
401		413
1,037		1,360
2		2
1		1
10,714		12,917
1,160		1,199
9,524		11,688
8		8
22		22
7,683	2	13,342
1,753		1,779
5,825	2	11,457
20		21
85		85
9,104		12,349
1,924		1,993
7,162		10,338
17		17

UE 416 PGE's Response to OPUC DR 144

1		1
5,662	2	9,618
497	7,000	516
5,160	2	9,097
5		5
1		1
1		1
12,909	4	17,534
905		929
11,985	4	16,586
3	8	3
16		16
9,261	4	14,143
967		1,004
8,262	4	13,107
7		7
25		25
5,190	4	5,814
741		785
4,434	4	5,014
.5		5
10		10
1,683	1	1,935
363	9	379
1,319	1	1,555
1		1
1,634	5	1,976
361	1	372
1,259	4	1,589
14		15
85		102
15		18
68		82
2		2
1,546		1,878
354		380
1,187	,	1,493
2		2
3		3
4,014		6,120
706		736
3,297	,	5,373
1		1
10		10

UE 416 PGE's Response to OPUC DR 144

2,358		2,581
785		799
1,569		1,778
4		4
1,717	1	2,085
337		361
1,371	1	1,715
9		9
1,066	1	1,192
333		349
732	1	842
1		1
288		347
71		80
216		266
1		1
1,701	2	2,047
391		415
1,306	2	1,628
1		1
3		3
14,254		21,345
2,587		2,675
11,504		18,506
9		9
154		155
14,079	2	24,809
3,074		3,149
10,880	2	21,534
22		22
103		104
23		24
5		6
18		18
1,174		1,628
94	9	97
1,080		1,531
654		734
227		236
427		498
9,784	1	14,058
1,849		1,926
7,842	1	12,022
8		8

UE 416 PGE's Response to OPUC DR 144

85		102
2,364	3	2,875
476	-	495
1,881	3	2,373
4		4
3		3
871		955
448		457
412		487
11		11
8,661	1	11,190
1,639		1,689
7,008	1	9,487
9		9
5		5
1,455		1,726
340		360
1,105		1,356
1		1
9		9
5,703	1	8,016
634		641
4,991	1	7,296
72		73
6		6
14,533	5	22,745
2,511		2,585
11,984	5	20,121
6		6
32		33
9,106		14,521
1,389	9	1,428
7,702		13,077
6		6
9		10
832	1	1,007
571	1	585
250		409
		1
11		12
2,427		3,547
307		313
2,117		3,231
1		1

UE 416 PGE's Response to OPUC DR 144

2		2
16,471	5	23,660
1,516	000	1,589
14,926	5	22,042
5		5
24		24
1		1
1		1
9,460		17,378
2,097	9	2,124
7,342		15,232
12		12
9		10
6,905	3	9,769
1,815		1,840
5,069	3	7,908
5		5
16		16
16		19
9		9
4		9 7 3
3		
1		1
1,		1
2,457		3,371
244		252
2,206		3,112
5		5
2		2
11,551	6	18,264
2,802	1	2,881
8,708	5	15,338
9		12
32	96.1	33
6,056	4	8,191
477	_	513
5,577	4	7,676
2	<u></u>	2
3,919	2	4,707
		471
458		
3,448	2	4,223
3,448 8	2	4,223 8
3,448	2	4,223

UE 416 PGE's Response to OPUC DR 144

1,592		1,637
8,056	2	12,920
22		22
36		38
4		4
3		3
1		1
14,446	12	18,845
1,251	12	1,292
13,144	12	17,501
33	12	34
18		18
4,228	2	
	2	<b>5,871</b> 311
302	2	J. Company
3,911	2	5,545
10		10
5	2.53	5
11,398	5	17,532
1,865		1,907
9,482	5	15,573
25		25
26		27
14,125	1	23,494
2,370		2,410
11,709	1	21,038
37		37
9		9
11,192	5	17,643
1,622		1,641
9,557	5	15,989
11		11
2		2
7,607	6	12,699
1,101		1,129
6,467	6	11,530
30		31
9		9
366		481
51		54
312		423
2		2
1		2
20,252	4	29,851
1,505		1,549

UE 416
PGE's Response to OPUC DR 144
Attachment A

18,733	4	28,288
11		11
3		3
12,493	1	17,695
2,027		2,060
10,442	1	15,610
11		11
13		14
2,346	4	2,613
584		603
1		1
1,740	4	1,987
19		20
2		2
3,555		6,101
776		785
2,753		5,289
7	9	7
19		20
9,913	1	16,429
1,085		1,121
8,797	1	15,277
31		31
10,721		14,894
925		966
9,769		13,901
1		1
26		26
6,964		10,730
749		768
6,200		9,947
13		13
2		2
1		1 1
1		- 8
12		12
12		12
11,116	8	14,835
1,360	-	1,413
9,699		13,364
24		24
33		34
10,737	5	13,942
1,031		1,065

UE 416 PGE's Response to OPUC DR 144

T		
9,674	5	12,845
6		6
26		26
1		1
1		1
1		1
1		1 1
1		1
1		1
1		1
1		1
12,141	2	22,229
2,754	1	2,858
9,194	1	19,175
104		106
89		90
13,104	7	20,047
2,612		2,705
10,405	7	17,252
25		25
62		65
8,030		11,899
1,125		1,157
6,851	8	10,688
11		11
43		43
1,464		1,685
330		342
1,128		1,337
6		6
10,129	3	17,898
2,131		2,212
7,953	3	15,641
8		8
37		37
9,407	1	14,735
779		822
8,609	1	13,894
2		2
17		17
31		31
30		30
1		1
1		1

UE 416
PGE's Response to OPUC DR 144

1 Attachment A

1		1
3		3
3	,	3
6,572	4	9,745
1,229		1,288
5,298	4	8,411
26	7.	26
19		20
211		236
78		80
133		156
302		328
80		82
222		246
695	1	1,006
199		208
493	1	795
3		3
142		161
34		39
108		122
1,538		1,993
456		473
1,082		1,520
139		157
51	8	52
88		105
1		1
1		1
528		646
113		126
415		520
2,823		3,450
572		600
2,243		2,842
8		8
6,072	5	7,895
1,375		1,425
4,665	5	6,438
32		32
177		211
50		56
125		153
2		2

UE 416 PGE's Response to OPUC DR 144

Attachment A

1,863		2,377
392		421
1,464		1,945
6		6
1		5
1,196	1	1,630
241		255
950	1	1,370
5		5
621,351	185	920,074

March 28, 2023

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE's First Revised Response to OPUC Data Request 144
Dated March 9, 2023

## Request:

Please provide the following data, broken down by zip code, for each customer class (i.e. residential, commercial, etc.):

- a. Count of Smart Meters that support remote disconnect/reconnect functionality;
- b. Count of Smart meters that do not support remote disconnection/reconnect functionality; and
- c. Count of Non-network meters that require a site visit to read, disconnect, and reconnect service.
- d. For each of the items listed in a-c above, please provide a monthly breakdown, by zip code, for all non-payment disconnections, dated to the end of the Covid-19 moratorium.

## Original Response (dated March 23, 2023):

Attachment 140-A provides the response to parts a, b and c.

In response to part d, PGE did not perform any disconnections for non-payment during the Covid-19 moratorium.

## Revised Response (dated March 28, 2023):

Attachment 144-A provides the response to parts a, b and c.

In response to part d, PGE did not perform any disconnections for non-payment during the Covid-19 moratorium.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 145 Dated March 9, 2023

## Request:

Please provide the cost analysis used to determine the fee charges for remote disconnection/reconnection capable meters versus manually disconnection/reconnection (requires PGE personnel to go out to the customers location). Please include in the analysis, details and data related to differences to the internal processes for Smart meters versus non-network meters.

## Response:

The cost analysis for reconnection fees is provided in the Schedule 300 workpapers contained in Exhibit 1300.

PGE charges the same reconnection fee to all customers regardless of whether their meter is able to be disconnected/reconnected remotely or manually. PGE does not charge different amounts based on meter type because the customer does not choose their meter type in most cases.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 146
Dated March 9, 2023

## Request:

What options are available for customers requesting a submersible transformer?

## Response:

For a residential single phase submersible request, PGE offers options such as a standard pad mount transformer, standard overhead transformer, or screening options if the customer is concerned about aesthetics. For commercial applications, PGE offers a Class A vault option, which puts the transformer inside the building, standard pad mount and standard overhead transformers. In all instances, the submersible is considered a non-standard installation.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 147 Dated March 9, 2023

## Request:

How many requests has the company received for a submersible transformer over the past five years?

## Response:

PGE does not track requests for submersible transformers. In the last 5 years PGE has installed 58 single phase submersible transformers for customer requested jobs.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 148 Dated March 9, 2023

## Request:

What is the estimated costs for ongoing upkeep of a submersible transformer? Could these costs be included in the installation estimate to avoid the concern about other customers paying for the ongoing upkeep?

## Response:

The estimated costs for ongoing upkeep of a submersible transformer are:

- Annual submersible transformer maintenance \$50.29
- Utilization Transformers, submersibles \$782.00

PGE does include these costs in the submersible transformer installation charges as described in Schedule 300, page 3.

To: Marc Hellman

**Public Utility Commission of Oregon** 

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 149 Dated March 9, 2023

## Request:

Please describe the fee to research PCB content in a transformer.

- a. How often was this fee charged for each calendar year from 2019 to 2022.
- b. How many PCB containing transformers does PGE still maintain in its service territory?

## Response:

- a. The PCB Inquiry Fee was charged for 5 transformers in 2019, 1 in 2020, 1 in 2021, and 0 in 2022.
- b. As a practice, PGE has historically not purchased or installed PCB transformers in its system. However, over the years, PGE has acquired other utility infrastructure with PCB contamination, or there has been cross-contamination in the transformer fluids from manufacturers or installers. PGE has approximately 193,600 total distribution transformers in service. From 2016-2020, PGE undertook significant efforts to assess and remove PCB and PCB-Contaminated transformers from its system under the PCB Transformer Replacement Program; however, PCBs do remain mostly in very low concentrations. The Toxic Substances Control Act (TSCA) defines "PCB-Contaminated Transformers" as those with 50 - 499 parts per million (ppm) PCBs and "PCB Transformers" as those with concentrations over 500 ppm. In PGE's distribution system, we have approximately 760 known PCB-Contaminated Transformers remaining in service. In addition to the concentrations defined and regulated by TSCA, PGE has used laboratory tests of mineral oil to determine PCB concentrations down to as little as 1 ppm. We estimate that PGE has approximately 17,500 transformers in service with detectable levels of PCBs between the testing level and 50 ppm. Approximately 17,400 transformers have unknown PCB content or concentration.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 150
Dated March 9, 2023

## Request:

How does PGE estimate the cost to install conduit on a wood pole for the purposes of street lighting?

#### Response:

PGE estimates the cost to install a 1" conduit on a wood pole for the purpose of streetlighting based on the cost of materials and labor needed per installation. Material costs are variable depending on pole height. The minimum cost for the 1" conduit unit installation today is \$313.00.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 151
Dated March 9, 2023

## Request:

How often does the company install conduit on a wood pole for street lighting (annual estimate)?

## Response:

PGE performs the Schedule 300 installation of conduit on a wood pole for street lighting on average 9 times annually.

April 18, 2023

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 482 Dated April 4, 2023

## Request:

The company provided Schedule 300 rates based on an average of costs for the activity. The reconnect rate provided average company costs for a non-network reconnect. Please provide the cost per transaction for a remote reconnect during business hours and if applicable, after hours. Include workpapers.

## Response:

Attachment 482-A provides the cost to PGE per remote reconnect.

# PORTLAND GENERAL ELECTRIC Remote Reconnect Cost per Transaction 2024

2023 Average Meter Operations Coordinator Hourly Rate	\$33.82
Expected Annual Labor Rate Increase	4.0%
2024 Forecasted Average Meter Operations Coordinator Hourly Rate	\$35.17
Budgeted Labor Loadings	1.51
2024 Forecasted Average Meter Operations Coordinator Loaded Hourly Rate	\$53.11
Average Job Duration	5 minutes
2024 Average Cost to PGE per Remote	
Reconnection	\$4.43

April 18, 2023

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 483
Dated April 4, 2023

## Request:

Schedule 300 Workpapers filed with the Reconnect Rate state the duration for a business hours reconnected is .5 hours. Of the data the company averaged what was the shortest, longest, and the median reconnection time.

## Response:

PGE objects to this request in that it is unduly burdensome and requires new analysis since PGE does not track the time for each reconnection. Without waiving said objection, PGE states as follows:

The duration of a reconnection depends on the distance of the crew dispatched and the location of the meter. PGE does not collect data on the duration of each reconnection trips.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 542
Dated April 14, 2023

## Request:

Please provide a sample copy of the current standard QF contract, that includes the monthly fee charges.

## Response:

All of PGE's standard QF contracts and related schedules can be found at the following link: <a href="https://portlandgeneral.com/renewable-installers/interconnection-resource-library">https://portlandgeneral.com/renewable-installers/interconnection-resource-library</a>

The monthly fee charge can be found in Schedule 201: Qualifying Facility 10 MW or Less Avoided Cost Power Purchase on Sheet No. 201-20. Schedule 201 is incorporated by reference in the standard QF contracts.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 543
Dated April 14, 2023

## Request:

Please provide a sample copy of the proposed standard QF contract, that includes the monthly fee charges.

## Response:

See PGE's response to OPUC Data Request 542 for the current contract. PGE proposed a change to Schedule 201 that would move the Monthly Service Charge to Schedule 300 – for details, please see PGE Exhibit 1309.

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 544 Dated April 14, 2023

## Request:

For QF contracts:

a. What is the process for renegotiation of QF contracts?

i. Would a QF's renegotiated contract continue to receive the monthly service charge based on the current rate/original contract.

Or,

ii. Would they be subject to the new, proposed rate?

## Response:

The process for renegotiation of a QF contract is the same as that for an initial QF contract and included in Schedule 201. See also PGE's response to OPUC Data Requests 542 and 543. The monthly service charge for which the QF would be responsible will depend upon the terms and conditions of the QF contract and Schedule 201 in effect at that time. Most QFs execute a standard PURPA contract that is reviewed and approved by the Commission. In the next few months, PGE will be updating its standard PURPA contract in light of the recent changes to OAR 860-029 adopted in Order No. 23-152 (April 25, 2023).

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 545
Dated April 14, 2023

## Request:

Please describe the reasons, and any supporting contract text from existing contracts, as to why the proposed revised monthly fee cannot be applied to existing contracts.

#### Response:

PGE objects to this request on the basis that it seeks a legal conclusion. Without waiving its objection, PGE responds as follows.

See PGE's response to OPUC Data Request 544. The proposed monthly fee cannot be applied to existing contracts because the "then current Schedule 201" is included as part of the contract at execution. In other words, existing contracts contain language from the Schedule 201 in effect at execution that the monthly service charge will be \$10 per month. PGE cannot change or update that provision for existing contracts which were signed when the then-current Schedule 201 specified the monthly service charge at \$10 per month.

May 19, 2023

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 726 Dated May 5, 2023

## Request:

Please provide a monthly breakdown for each of calendar years 2019-2023 inclusive, of the following:

- a. Number of reconnects for:
  - i. Remote connect AMI meters,
  - ii. Non-remote connect AMI meters, and
  - iii. Non-AMI meters.

## Response:

Attachment 726-A provides a monthly breakdown of the number of reconnects for remote connect AMI meters, non-remote connect AMI meters and non-AMI meters from 2019 through April 2023.

Staff/2403 Nottingham-Shearer/53 UE 416 PGE's Response to OPUC DR 726 Attachment A

YEAR	DEVICE DESCRIPTION	January	February	March	April	May	June	July	August	September	October	November	December
2019	NON-REMOTE CONNECT AMI METER	743	583	980	1,395	1,175	922	734	575	479	482	325	264
	REMOTE CONNECT AMI METER	1,103	709	1,324	2,087	1,860	1,636	2,079	1,428	1,358	1,798	1,289	1,153
2020	NON-REMOTE CONNECT AMI METER	386	393	133	8	3	1	2	17	9	3	16	16
	REMOTE CONNECT AMI METER	1,454	1,462	605	10	1	2	2	2	7	4	4	33
2021	NON-REMOTE CONNECT AMI METER	4	4	18	46	33	40	39	36	38	30	30	23
	REMOTE CONNECT AMI METER	11	15	8	8	7	9	6	39	201	326	465	470
2022	NON-REMOTE CONNECT AMI METER	70	35	52	29	92	239	185	192	111	153	93	79
	REMOTE CONNECT AMI METER	404	635	932	988	1,069	982	978	1,556	1,188	1,394	951	703
2023	NON-AMI METER				1								
	NON-REMOTE CONNECT AMI METER	107	35	131	52								
	REMOTE CONNECT AMI METER	1,609	735	2,180	633	9							

May 24, 2023

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company UE 416 PGE Response to OPUC Data Request 727 Dated May 5, 2023

## Request:

For 2022 and 2023 calendar years inclusive, by meter type (Remote connect AMI meters, Non-remote connect AMI meters, and Non-AMI meters), please provide the number of reconnect fees charged for:

- a. All customers,
- b. Customers designated as low-income who had charges waived, and
- c. Customers designated as low-income who were charged reconnect fees.

#### Response:

PGE objects to this request as it is unduly burdensome and requires new analysis to the extent the data was not available to track waived charges until February 2023. Subject to and without waiving its objections, PGE responds as follows:

Attached 727-A provides the number of reconnect fees charged by meter type (remote connect AMI meters, non-remote connect AMI meters, and non-AMI meters) for all customers, customers designated as low-income who had charges waived, and customers designated as low-income who were charged reconnect fees. PGE followed the COVID-19 Stipulation Agreement in Docket No. UM 2114 approved by Order No. 20-401, in which PGE and other utilities agreed to not apply reconnection fees to residential customers before October 1, 2022. Although the OAR Chapter 860, Division 21 rule revisions was effective on September 30, 2022, PGE requested and was granted a temporary waiver for the remainder of 2022 from OAR 860-021-0330(1)(2) due to ongoing customer care and billing system upgrades. While low-income customers were not charged reconnection fees, on January 31, 2023, PGE implemented system changes to track the low-income protections for waived charges and reconnect fees.

The number of reconnect fees in 2022 provided in PGE's response to Staff Data Request No. 141 included waived reconnect fees.

## UE 416

# PGE's Response to OPUC DR 727

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			b. Customers designated as low-	c. Customers designated as low-income
		a. All Customers	income who had charges waived	who were charged reconnect fees
2022	Remote connect AMI meters	864	N/A	3
2022	Non-remote connect AMI meters	236	N/A	1
2022	Non-AMI meters	-	N/A	-
2023	Remote connect AMI meters	4,988	848	99
2023	Non-remote connect AMI meters	387	25	5
2023	Non-AMI meters	-	-	-

May 19, 2023

To: Marc Hellman

Public Utility Commission of Oregon

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 728
Dated May 5, 2023

#### Request:

Please provide PGE's criteria for installing remote reconnect AMI meters, including, but not limited to:

- a. Standard procedure for determining installation,
- b. Special criteria such as number of reconnects, etc.,
- c. Other criteria, such as access/location of meter base,
- d. Any other scenarios/situations that PGE would use to determine the need to install a remote capable smart meter.

## Response:

- a. PGE installs remote reconnect AMI meters on all new residential premises limited to form 2S (120/240V) or 12S (120/208V) and class 200 meters. If an existing residential meter without remote connect capability is removed/exchanged, it will be replaced with a remote reconnect capable meter.
- b. See response to part c.
- c. Attachment 728-A provides the minimum requirements for AMI meters at PGE that will meet or exceed the latest applicable ANSI C12 standards. PGE's Electric Service Requirements,
  - https://downloads.ctfassets.net/416ywc1laqmd/2PmrU1CptipEQUJAD1Ooyb/a117078d490246f0 0770e34bed073a62/ESR\_Current\_Book.pdf, Section 3.9 provides meter installation guidelines, and section 5 provides meter locations and clearances guidelines.
- d. PGE began exchanging non-remote residential meters with remote disconnect meters in 2020 at non-owner occupied locations, sites without a contract, and any site visited for credit purposes. The initial phase of the project consisted of 25,000 meters exchanged in 2020. The exchanges decreased through 2022 due to supply chain delays experienced in 2021 and 2022. Also, there are a small number of commercial customers with remote reconnect AMI meters. If a commercial customer has a meter base with 120/240V and class 200 (i.e., shops, barns), they may have a remote capable meter.



## **AMI Meter Requirements**

2-25-2020 Meter Operations Standard Doc 2.2.3

## **Purpose**

Meter Operations Standard 2.2.3 — *AMI Meter Requirements* —provides minimum requirements for AMI revenue meters at PGE Meters that will meet or exceed latest applicable ANSI C12 standards.

## References

<u>ESR</u>	PGE Electric Service Requirements
ANSI C12.1	Electric Meters – Code for Electricity Metering
ANSI C12.10	Physical Aspects of Watthour Meters – Safety Standard
ANSI C12.18	Protocol Specification for ANSI Type 2 Optical Port
ANSI C12.20	Electricity Meters – 0.1, 0.2, and 0.5 Accuracy Classes

## **Definitions**

Delivered	Energy that is supplied by PGE to the customer
Received	Energy that is produced by the customer and supplied to PGE
TOU	Time of Use

## **Meter** Requirements

## **Forms**

The following meter forms will be available:

Form	Class	Voltage	Notes
1S	200	120V	Indicated by voltage in bold with shaded background, e.g. <b>120V</b>
2S	200	240V	
2S	200	120-480V	
2S	320	240V	
3S	20	120-480V	
48	20	120-480V	
5S (35S)	20	120-480V	
6S (36S)	20	120-480V	
9S (8S)	20	120-480V	
12S	200	120-480V	
16S	200	120-480V	

## Voltage Range

Operating voltages are required to be between 120VAC to 480VAC.

## **Adjustment**

Meters shall not have any calibration or accuracy adjustment.

## **Functions and Upgrades**

The following functions and upgrades will be available:

- TOU
- VAr
- Bi-directional quantities (e.g. Net metering)
- External outputs (e.g. KYZ pulses), for non-residential meters
- Non-volatile memory storage of meter program and billing quantities

#### **Demand**

- Meters will be capable of a 30-minute demand interval
- Demand will be capable of being electronically reset using PGE's current AMI system
- Meter will be capable of deactivating the demand reset plunger using manufacturer software
- Demand reset plunger will be sealable
- Demand will be programmable to reset as a recurring event on a specific date and time

## **TOU Option**

- Meters will be capable of registering TOU energy
- Meters will have minimum four TOU rates
- Calendar will be capable of being electronically updated using PGE's current AMI system

#### **Load Profile**

- Residential meters will have minimum two channels of load profile data
- Non-residential meters will have minimum eight channels of load profile data

## **KYZ Option**

- Non-residential meters will have option of KYZ functionality
- KYZ option will have minimum of two KYZ outputs
- KYZ pulse weight will be scalable from 0.075 to 100000 using manufacturer software.

## **Optical Port**

- Non-residential meters will have an ANSI Type 2 optical port, as specified in ANSI C12.18
- Optical port will be accessible without removal of meter cover

#### **Remote Connect/Disconnect**

- Residential meters (Form 2S, class 200 and Form 12S, class 200) will have remote connect/disconnect capability.
- Meters will have visible indication of switch status
- Meters will be identified on faceplate as remote connect

#### Cover

- · Cover will be made of acrylic or polycarbonate materials
- Cover will be sealable with "T" type seals
- Faceplate will be visible through front of cover
- For non-residential meters, cover will have an ANSI Type 2 optical port

## Ring

Meters will seal with a standard socket ring

#### **Blades**

• Meter terminal blades will be beveled and meet ANSI C12.10 dimensions

## **Operating Conditions**

- Meter will be capable of operating within temperature range of -40°C to +85°C, as measured inside meter cover
- Meter will be capable of operating within humidity range of 0% to 95% noncondensing humidity

## Frequency

Meters will operate at 60Hz

## **Display Modes**

Meters will have three display modes: normal, alternate, and test.

Registers will have minimum two-digit ID number

## **Normal Displays**

The following displays will be available in normal display mode:

- Total kWh
- Shoulder kWh
- On-peak kWh
- Off-peak kWh
- Total peak kW
- Shoulder-peak kW

- On-peak kW
- Off-peak kW
- Total kVArh
- Shoulder kVArh
- On-peak kVArh
- Off-peak kVArh
- Total peak kVAr
- Shoulder-peak kVAr
- On-peak kVAr
- Off-peak kVAr
- Current date
- Current time
- Remote connect status, if applicable

#### **Alternate Displays**

Alternate mode will be activated on the external of the meter and/or using manufacturer software. The following displays will be available in alternate display mode:

- · All displays listed in Normal Displays section
- Date of last reset
- Program ID
- Transformer ratio/Meter multiplier
- Demand interval length
- Number of power outages
- Number of demand resets
- Power factor
- Total kVA
- Per phase voltage
- Per phase current

#### **Test Mode Displays**

Test mode will be activated on the external of the meter and/or using manufacturer software. The following displays will be available in alternate display mode:

- All displays listed in Normal Displays section
- Date of last reset
- Program ID

#### **Load Indicator**

Meter will indicate and display energy flow direction

## **Voltage Indicator**

Meter will indicate and display nominal voltage

## **Display**

- Meter will have LCD or equivalent display
- Display will be readable from 10 feet
- Display will be readable when exposed to direct sunlight
- Display will be capable of operating within temperature range of -40°C to +85°C, as measured inside meter cover

## **Battery**

All removable batteries will meet following requirements:

- Minimum operational life of two years
- Minimum shelf life of ten years

All permanent batteries will meet following requirements:

- Minimum operational life of fifteen years
- Minimum shelf life of ten years

## **Factory Program**

• Meters will be programmed at factory per PGE program requirements

## Warnings/Errors/Failures

 Meters will be capable of detecting internal hardware failure and communicating failure(s) using PGE's current AMI system

#### **Communication Module**

- Communication modules will be FCC compliant and compatible with PGE's current AMI system
- Information transmitted to PGE's current AMI system will include:
  - Unique meter identifier(s)
  - Register data
  - Interval data
  - Instantaneous measurements, e.g. voltage, current, frequency
  - Demand reset date/time
  - Tamper indicators

## Inspection

PGE will inspect a sample lot of meters upon delivery from supplier and perform testing per ANSI/ASQ Z1.4 to ensure compliance with requirements.

#### **Documentation**

Manufacturer will provide hardware, software, and manuals.

ANSI C12 certification and test results will be provided upon request.

**AMI Meter Requirements** 

Nottingham-Shearer/62 Doc 2.2.3

Staff/2403

**Revision History** 

2-25-2020

Revision	Revised on	Description	Authored by	Approved by
0	2/25/2020	Initial document creation	J. Wilson	B. Simpson

May 24, 2023

To: Marc Hellman

**Public Utility Commission of Oregon** 

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 773
Dated May 10, 2023

## Request:

In additional to the information provided in Staff's Data Request 757, please provide the same breakdown based on Standard versus After Hours reconnect fees for:

- a. All customers,
- b. Customers designated as low-income who had charges waived, and
- c. Customers designated as low-income who were charged reconnect fees.

## Response:

PGE objects to this request as it is unduly burdensome and requires new analysis to the extent the data was not available to track waived charges until February 2023. Subject to and without waiving its objections, PGE responds as follows:

Attached 773-A provides the data provided in Attached 727-A additionally separated out by Standard versus After Hours reconnect fees. PGE followed the COVID-19 Stipulation Agreement in Docket No. UM 2114 approved by Order No. 20-401, in which PGE and other utilities agreed to not apply reconnection fees to residential customers before October 1, 2022. Although the OAR Chapter 860, Division 21 rule revisions was effective on September 30, 2022, PGE requested and was granted a temporary waiver for the remainder of 2022 from OAR 860-021-0330(1)(2) due to ongoing customer care and billing system upgrades. While low-income customers were not charged reconnection fees, on January 31, 2023, PGE implemented system changes to track the low-income protections for waived charges and reconnect fees.

The number of reconnect fees in 2022 provided in PGE's response to Staff Data Request No. 141 included waived reconnect fees.

UE 416 PGE's Response to OPUC DR 773 Attachment A

				b. Customers designated as low-	c. Customers designated as low-income
				_	who were charged reconnect fees
2022	Remote connect AMI meters	Standard Hours	775	N/A	-
2022	Remote connect AMI meters	After Hours	89	N/A	3
2022	Non-remote connect AMI meters	Standard Hours	227	N/A	-
2022	Non-remote connect AMI meters	After Hours	9	N/A	1
2022	Non-AMI meters	Standard Hours	-	N/A	-
2022	Non-AMI meters	After Hours	-	N/A	-
2023	Remote connect AMI meters	Standard Hours	4,371	825	13
2023	Remote connect AMI meters	After Hours	617	23	86
2023	Non-remote connect AMI meters	Standard Hours	337	25	3
2023	Non-remote connect AMI meters	After Hours	50	-	2
2022	Non-AMI meters	Standard Hours	-	-	-
2022	Non-AMI meters	After Hours	-	-	-

May 24, 2023

To: Marc Hellman

**Public Utility Commission of Oregon** 

From: Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company
UE 416
PGE Response to OPUC Data Request 774
Dated May 10, 2023

## Request:

Please review PGE Exhibit 1300, Schedule 300 Calculations Temporary Services 2021 Rate workpapers, which lists two separate Outside Services for temporary overhead services. The worksheet named Final Calculations 2024, item U (cell F40), lists \$60.00 for temporary over service, however, the worksheet named Temp OH Perm Service 2024 (cell F34) lists the Outside Services as \$83.00. Please explain the discrepancy and clarify which amount is correct.

## Response:

The \$83 figure in cell F34 on worksheet 'Temp OH Perm Service 2024' is the correct amount. See cell R26 on worksheet 'Unit Costs\_As of 12-01-22' for the source of the \$83 figure.

The 'Final Calculations 2024' tab was not fully updated and does not provide the correct amount.